



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

BORIS NAYFELD,

Defendant.

INFORMATION

16 Cr. ____ (KBF)

16 CRIM 207

COUNT ONE

(Conspiracy to Commit Extortion)

The United States Attorney charges:

1. From at least in or about October 2015, up to and including at least in or about January 2016, in the Southern District of New York and elsewhere, BORIS NAYFELD, the defendant, and others known and unknown, unlawfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit extortion, as that term is defined in 18 U.S.C. § 1951(b)(2), by obtaining money and property from and with the consent of another person, which consent would have been and was induced by the wrongful use of actual and threatened force, violence, and fear, and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in 18 U.S.C. § 1951(b)(3), to wit, NAYFELD, having informed an individual ("Victim-1") that NAYFELD had been asked to arrange the murder of Victim-1, agreed with a co-conspirator not named

JUDGE FORREST

herein to induce Victim-1 to pay NAYFELD to stop the murder plot.

(Title 18, United States Code, Section 1951.)

COUNT TWO
(Extortion)

The United States Attorney further charges:

2. From at least in or about October 2015, up to and including at least on or about January 14, 2016, in the Southern District of New York and elsewhere, BORIS NAYFELD, the defendant, and others known and unknown, unlawfully and knowingly committed and attempted to commit extortion, as that term is defined in 18 U.S.C. § 1951(b)(2), by obtaining money and property from and with the consent of another person, which consent would have been and was induced by the wrongful use of actual and threatened force, violence, and fear, and thereby would and did obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in 18 U.S.C. § 1951(b)(3), and did aid and abet the same, to wit, NAYFELD, having informed Victim-1 that NAYFELD had been asked to arrange the murder of the Victim-1, collected and attempted to collect payment from Victim-1 to stop the murder plot.

(Title 18, United States Code, Section 1951 and 2.)


PREET BHARARA *NEH*
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

BORIS NAYFELD,

Defendant.

INFORMATION

16 Cr. ____

(18 U.S.C. §§ 1951 & 2.)

PREET BHARARA

United States Attorney.

3/15/16 - Arraignment Held. Time in court: 30 minutes
Defendant present with attorney Frank Tassone. AUSA Kimberly
Ravener present. Special Agent Luke Hardison present. Court
Reporter present. Russian Interpreter present. Defendant
arraigned on the Information and enters a plea of Not
Guilty to both counts. order to follow. Remand
Continued.